

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 23-CV-61256-BECERRA/STRAUSS**

MONARCH AIR GROUP, LLC,

Plaintiff,

v.

JOURNALISM DEVELOPMENT  
NETWORK, INC., *et al.*,

Defendants.

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**JOINT DISCOVERY STATUS REPORT**

Pursuant to this Court's Discovery Procedures Order [ECF No. 63], Plaintiff Monarch Air Group, LLC ("Plaintiff") and Defendant Journalism Development Network, Inc. ("JDN") (collectively, the "Parties"), by and through their undersigned counsel, hereby file this Joint Discovery Status Report in advance of the hearing scheduled for Friday, August 23, 2024 at 3 p.m. on JDN's Notice of Discovery Dispute [ECF No. 69]. The Parties state as follows:

**Discovery Dispute No. 1**

The Parties dispute concerning entry of a confidentiality order to govern production of information and materials was resolved. The Parties agreed that a confidentiality order is appropriate and necessary, and will file a joint motion for entry of a stipulated order on or before Thursday, August 22, 2024.

**Discovery Dispute No. 2**

The Parties dispute concerning verification of Plaintiff's responses and objections to JDN's First Set of Interrogatories was resolved. Plaintiff served verified responses and objections on August 15, 2024.

**Discovery Dispute No. 3**

The Parties dispute concerning a date certain by which Plaintiff will produce documents it has agreed to produce in response to JDN's First Request for Production was resolved. Plaintiff on August 20, 2024 produced one additional document, and advised that Plaintiff did not intend to produce additional documents without a confidentiality order. Plaintiff additionally agreed to serve a revised response on or before August 26, 2024.

Respectfully submitted,

**STOK KON+ BRAVERMAN**

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*Attorneys for Defendant  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this **21st** day of **August, 2024**, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties and counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

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*/s/ Dana J. McElroy*  
Attorney